

---

# PUBLIC SUBMISSION

<b>As of:</b> September 07, 2010
<b>Received:</b> September 02, 2010
<b>Status:</b> Pending_Post
<b>Tracking No.</b> 80b43393
<b>Comments Due:</b> September 21, 2010
<b>Submission Type:</b> Web

**Docket:** EBSA-2010-0019

Interim Final Rules for Group Health Plans and Health Insurance Issuers Relating to Internal Claims and Appeals and External Review Processes Under the Patient Protection and Affordable Care Act

**Comment On:** EBSA-2010-0019-0001

Interim Final Rules for Group Health Plans and Health Insurance Issuers Relating to Internal Claims and Appeals and External Review Processes Under the Patient Protection and Affordable Care Act

**Document:** EBSA-2010-0019-DRAFT-0011

Comment on FR Doc # 2010-18043

---

## Submitter Information

**Name:** Ghassan Bahnam

**Address:**

MES Soltions  
100 Morse St.  
Norwood, MA, 02062

**Email:** ghassan.bahnam@mesgroup.com

**Phone:** 800-706-8427

**Organization:** MES Solutions, Inc.

---

## General Comment

I am confused regarding the turnaround time for the provision of an expedited or urgent internal appeal process under the NAIC Uniform Model act. Is it 24 or 72 hours?